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Your First Choice, LLC d/b/a
First Choice Payday Loan

**UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA**

IRMA RODRIGUEZ,)
Plaintiff,) Civil Action No.: 2:16-cv-02447
v.)
YOUR FIRST CHOICE, LLC D/B/A)
FIRST CHOICE PAYDAY LOAN;)
Defendants.)

**DEFENDANT YOUR FIRST CHOICE, LLC D/BA FIRST CHOICE
PAYDAY LOAN'S PROPOSED VOIR DIRE QUESTIONS**

DATE OF TRIAL: April 23, 2018

TIME OF TRIAL: 9:00 a.m.

COMES NOW Defendant YOUR FIRST CHOICE, LLC D/B/A FIRST CHOICE PAYDAY LOAN, by and through the Law Office of Andrew H. Pastwick, LLC, hereby files Defendant's Proposed Voir Dire Questions:

1 **DEFENDANT'S REQUESTED VOIR DIRE**
2 **QUESTION NUMBER 1**

3 Have you ever obtained a payday loan, and if so,

- 4 (a) whether you paid it back
5 (b) where you sued as a result of the payday loan

6 **DEFENDANT'S REQUESTED VOIR DIRE**
7 **QUESTION NUMBER 2**

8 Have you ever been contacted by a debt collector; and if so,

- 9 (a) was it for a pay-day loan
10 (b) did the debt collector contact you by telephone and/or in person
11 (c) did you consider the debt collector's behavior to be harassing or
12
13 abusive.

14 **DEFENDANT'S REQUESTED VOIR DIRE**
15 **QUESTION NUMBER 3**

16 Have you ever obtained a loan from someone other than a family member;
17
18 and if so,

- 19 (a) Did you repay the loan
20 (b) Where you contacted by a debt collector as a result of this loan.
21 (c) Did this loan result in litigation against you

1 **DEFENDANT'S REQUESTED VOIR DIRE**
2 **QUESTION NUMBER 4**

3 Do you have any negative thoughts about businesses that make payday loans
4 that would influence your judgment in this dispute?

5 **DEFENDANT'S REQUESTED VOIR DIRE**
6 **QUESTION NUMBER 5**

7 Are you or have you ever owned your own business

8 **DEFENDANT'S REQUESTED VOIR DIRE**
9 **QUESTION NUMBER 6**

10 Have you ever loaned money to a person that was not a family member, and
11 if so,

- 12 a. Did they pay you back.
13 b. How did you feel about the person not paying you back
14 c. What collection efforts did you pursue

15 **DEFENDANT'S REQUESTED VOIR DIRE**
16 **QUESTION NUMBER 7**

17 Do you believe that people who borrow money from a payday loan center
18 should be responsible for paying the loan back?

19 **DEFENDANT'S REQUESTED VOIR DIRE**
20 **QUESTION NUMBER 8**

21 Do you believe that people who borrow money from a business should be
22 allowed to avoid paying the loan back to the business?

23 **DEFENDANT'S REQUESTED VOIR DIRE**

1 **QUESTION NUMBER 9**

2 Do you own stock or bonds in a publicly traded corporation?

3 **DEFENDANT'S REQUESTED VOIR DIRE**
4 **QUESTION NUMBER 10**

5 Have you been lost a property as a result of a foreclosure action?

6 **DEFENDANT'S REQUESTED VOIR DIRE**
7 **QUESTION NUMBER 11**

8 Do you currently own or rent your own house?

9 **DEFENDANT'S REQUESTED VOIR DIRE**
10 **QUESTION NUMBER 12**

11 Do you own any properties that you are currently renting out to third-parties
12 that are not immediate family members?

13 **DEFENDANT'S REQUESTED VOIR DIRE**
14 **QUESTION NUMBER 13**

15 Have you filed for bankruptcy within the past ten (10) years?

16 **DEFENDANT'S REQUESTED VOIR DIRE**
17 **QUESTION NUMBER 14**

18 Have you ever had an automobile repossessed?

19 **DEFENDANT'S REQUESTED VOIR DIRE**
20 **QUESTION NUMBER 15**

21 Have you ever worked for a small business?

22 **DEFENDANT'S REQUESTED VOIR DIRE**
23 **QUESTION NUMBER 16**

24 If you were my client, would you be completely comfortable having you as a

juror on this case?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 17

Can you think of anything in your own life that reminds you of this case? What and how?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 18

Is there anything that you have seen or heard that would make it hard for you to guarantee to judge my client the same as the other side?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 19

Is there anything you would prefer to discuss in private?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 20

Is there anything we haven't asked you that you think we should know?

DATED this 16th day of April, 2018

LAW OFFICE OF ANDREW H. PASTWICK
L.L.C.

By: /S/ Andrew H. Pastwick
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d/b/a First Choice Payday Loan

CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b), I certify that I am an employee of the Law Office
of Andrew H. Pastwick, and not a party to, nor interest in, the within action, that on
April 16th, 2018, a true and correct copy of the foregoing DEFENDANT YOUR
FIRST CHOICE, LLC D/B/A FIRST CHOICE PAYDAY LOAN'S PROPOSED
VOIR DIRE QUESTIONS served via pacer to:

David H. Krieger, Esq.
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/S/ Andrew H. Pastwick
An Employee of Law Office of Andrew H. Pastwick L.L.C.